

5:21-CV-00381-OLG

EXHIBIT C

PLAINTIFF'S RESPONSES TO REQUEST FOR ADMISSIONS

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**VITRA DENISE FREDERICK,
Plaintiff**

V.

**CITY OF LEON VALLEY, TEXAS
Defendant**

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CASE NO. SA:21-CV-00381-OLG

PLAINTIFF'S ANSWERS TO DEFENDANT'S REQUESTS FOR ADMISSIONS

TO: Defendant, CITY OF LEON VALLEY, TEXAS, by and through its attorney of record, Charles S. Frigerio of LAW OFFICES OF CHARLES S. FRIGERIO, 111 Soledad, Suite 840, San Antonio, Texas 78205

Please find Plaintiff's Answers to Defendants' Requests for Admission in accordance with the Rule 36 of the Federal Rules of Civil Procedure.

ADMISSIONS AND DENIALS TO REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1

That councilman Bennie Martinez was removed as a Councilman by a vote of the City of Leon Valley City Council

RESPONSE: Admitted

REQUEST FOR ADMISSION NO. 2

That Councilman Bennie Martinez as a City Councilman was not your employer.

RESPONSE: Plaintiff objects to this Request to the extent it requires Plaintiff to form a legal opinion. Therefore, same is denied.

REQUEST FOR ADMISSION NO. 3

That the City Manager of Leon Valley did not discriminate against you.

RESPONSE: Denied

REQUEST FOR ADMISSION NO. 4

That your position as City Attorney was defunded by the City Council for the City of Leon Valley.

RESPONSE: Denied

REQUEST FOR ADMISSION NO. 5

That you were replaced as City Attorney by the Law Firm of Denton, Navarro Rocha Bernal & Zech.

RESPONSE: Admitted

RESPECTFULLY SUBMITTED,
THE WILEY LAW GROUP, PLLC



Kevin S. Wiley, Jr.
SBOT # 24029902
325 N. St. Paul Street, Suite 4400
Dallas, Texas 75201
Tel.: 469-619-5721
Fax.: 469-619-5725
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing Plaintiff's Answer to Defendant's Requests for Admissions pursuant to Rule 36 of the Federal Rules of Civil Procedure have been delivered via email on this 6th day of February, 2023 to the attorneys listed below:

Charles S. Frigerio
csfrigerio@sbcglobal.net
frigeriolaw1995@sbcglobal.net
LAW OFFICES OF CHARLES S. FRIGERIO
Riverview Towers
111 Soledad, Suite 840
San Antonio, TX 78205
PH: (210) 271-7877
FX: (210) 271-0602



Kevin S. Wiley, Jr.